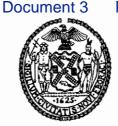
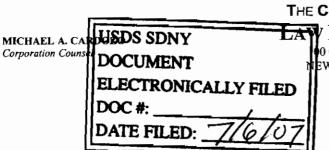
Case 1:07-cv-05727-PKC

MEMO ENDORSED







THE CITY OF NEW YORK

DEPARTMENT
OCHURCH STREET
NEW YORK, NY 10007

SABRINA TANN Phone: (212) 442-8600 Fax: (212) 788-9776 stann@law.nyc.gov

June 26, 2001 DECEIVE

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P. KEVIN CASTEL

U.S.D.J.

BY HAND DELIVERY

Honorable P. Kevin Castel United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: Ricardo Gayle v. City of New York et al., 07 CV 5727 (PKC)

Appliated granted

Your Honor:

As the Assistant Corporation Counsel assigned to the defense of the above-referenced civil rights action, I write to respectfully request that defendant City of New York's time to answer or otherwise respond to the complaint in this action be enlarged sixty (60) days to and including September 6, 2007. If have conferred with plaintiff's counsel, Richard Cardinale, Esq., and he consents to this request.

OK

As background, the complaint alleges, *inter alia*, that on April 22, 2007, Officer Narine Ramlochan and other unidentified members of the New York City Police Department falsely arrested and employed excessive force against plaintiff, Ricardo Gayle, in violation of his federal and state civil rights. As a threshold matter, an enlargement of time will allow this office to forward to plaintiff for execution authorizations for the release of the underlying criminal records and underlying medical records. Defendant cannot obtain these records without the authorizations, and without the records, defendant cannot properly assess this case or respond to the complaint. Accordingly, defendant requires this enlargement so that this office may obtain the underlying documentation, properly investigate the allegations of the complaint and fulfill its obligations under Rule 11 of the Federal Rules of Civil Procedure.

No previous request for an enlargement of time has been made. Accordingly, defendant respectfully requests that its time to respond to the complaint be extended to and including September 6, 2007.

I thank Your Honor for considering the within request.

Respectfully submitted,

Sabrina Tann (ST 2552)

Assistant Corporation Counsel Special Federal Litigation Division

cc: Richard Cardinale, Esq.
Attorney for Plaintiff
(By Facsimile)